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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

This Document Relates to Individual Case No.
3:13-cv-02171-SC

Master File No. 3:07-cv-05944-SC (N.D. Cal.)
MDL No. 1917

DELL INC. and DELL PRODUCTS L.P.,

Plaintiffs,

v.

HITACHI, LTD., *et al.*,

Defendants.

Individual Case No. 3:13-cv-02171-SC

**DECLARATION OF DEBRA D.
BERNSTEIN IN SUPPORT OF
PLAINTIFFS' MOTION TO PARTIALLY
EXCLUDE CERTAIN OPINIONS AND
EXPERT TESTIMONY OF EXPERT
DANIEL L. RUBINFELD**

1 I, **DEBRA D. BERNSTEIN**, declare as follows:

2 1. I am a Partner with the law firm of Alston & Bird LLP, counsel for Plaintiffs Dell Inc.
3 and Dell Products L.P. (collectively, "Dell") in the above-captioned action currently pending in the
4 U.S. District Court for the Northern District of California. I submit this Declaration in support of
5 Plaintiffs' Motion to Partially Exclude Certain Opinions and Testimony of Designated Expert Daniel L.
6 Rubinfeld ("Dell's Rubinfeld Motion").

7 2. I am a member in good standing of the State Bar of Georgia and am admitted to practice
8 before the U.S. District Court for the Northern District of Georgia. Pursuant to the Court's Pretrial
9 Order No. 1 in the MDL Proceeding, I have been admitted *pro hac vice* in this litigation.

10 3. Attached hereto as **Exhibit A** is a true and correct copy of the August 5, 2014, Expert
11 Report of Daniel L. Rubinfeld ("Rubinfeld Report").

12 4. Attached hereto as **Exhibit B** is a true and correct copy of the Samsung SDI Co., Ltd.'s
13 ("Samsung SDI") plea of guilty in *United States v. Samsung SDI Co., Ltd.*, No. 3:11-CR-00162 (N.D.
14 Cal.), entered on May 12, 2011.

15 5. Attached hereto as **Exhibit C** is a true and correct copy of the August 5, 2014, Expert
16 Report of Dennis Carleton ("Carleton Report").

17 6. Attached hereto as **Exhibit D** are true and correct copies of portions of the Transcript of
18 the September 8, 2014, Deposition of Daniel L. Rubinfeld.

19 I declare under penalty of perjury under the laws of the United States of America that the
20 foregoing is true and correct.

21 Executed on December 5, 2014, in Atlanta, Georgia.

22 /s/ Debra D. Bernstein

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